







**CORPORATE OFFICES**

SOUTHWOOD J. MORCOTT  
CHAIRMAN, PRESIDENT AND  
CHIEF EXECUTIVE OFFICER

May 28, 1993

Zubeida Moorjani, MD  
500 Riverside Drive  
Rossford, OH 43460

Dear Dr. Moorjani:

Thank you very much for your letter regarding the St. John's High School news article on my thoughts about the Jesuit School.

I also appreciate you sending me the resume on your son, Deepak. He certainly looks like an outstanding young person. I would suggest that the next time he is in Toledo for the holidays, you ask him to give us a call, as we would be happy to chat with him about his career objectives and aspirations.

Thank you again for your note.

Sincerely,



Southwood J. Morcott

SJM/gc

cc: Carl Hirsch  
Deepak G. Moorjani

"Kohlenberg, Kerstin" <Kerstin.Kohlenberg@zeit.de>

May 13, 2009 2:03 PM

To: DEEPAK

AW: Links to Articles

Hi Deepak,

oh yes, I read them and after that went to your scribt-page and read everything that is there.

What you discovered at Deutsche Bank in regards to almost 100percent loans and the connection to bonuses is exactly what apparently happened at Hypo Real Estate (only that they offered 160 percent commercial real estate loans which in German is actually against the law. I am researching that story right now) so I am a little familiar with the topic. I just did a story about Merkel and her advisers and how badly their bank-overview functions. (<http://www.zeit.de/2009/15/DOS-Kanzleramt>)

I believe what you discovered in a heartbeat. I think your demands for better risk management and a different incentive structure need more audience - and connected with that very case that you are presenting, it would make a big, big story. I write 8000 word features (kind of like a New York times Magazine Story) and I would very much write about you and the case you are making. There are a lot of people out there that demand change, but there is you who can show how rotten the system still is, and how the managers say one thing to the media and something else to people like you.

The fact that your letter was ccd to Angela Merkel makes it even more interesting, because I could confront her with it, and ask about her real interests in changing the system ( like she said on the G20 summit)

So any clue when you will be back in New York?

Kerstin

-----Ursprüngliche Nachricht-----

Von: DEEPAK MOORJANI

Gesendet: Mi 13.05.2009 18:50

An: Kohlenberg, Kerstin

Betreff: Links to Articles

Hi Kerstin,

Have you read these articles? If so, I'd welcome your thoughts.

A.

B.

Deepak

On May 14, 2009, at 12:57 AM, Kohlenberg wrote:

Deepak,

That's really unfortunate. When so you come back to the States?

Kerstin

Am 13.05.2009 17:51 Uhr schrieb "DEEPAK MOORJANI" unter

Hi Kerstin,

Unfortunately, I am stuck in Asia. Hearings are discontinuous, and I'm not sure when the next hearing will be. The April hearing was public, but most are closed hearings (including this Friday's hearing).

I'll recommend that we "meet" via videoconference. It's the next-best alternative and better than a phone call. Maybe even this weekend.

Thanks,  
Deepak

On May 14, 2009, at 12:10 AM, Kohlenberg wrote:

Hi Deepak,

Thanks again. Just two quick questions in order to plan my trip next

week:  
Would it be possible to meet sometime next week in New York? Is the hearing on Friday public?

All the best from Hamburg

Kerstin

Am 13.05.2009 15:53 Uhr schrieb "DEEPAK MOORJANI" unter [deepakmoorjani@gmail.com](mailto:deepakmoorjani@gmail.com):

Hi Kerstin,

As background, please review my background (attached). My training and experience as an investor have allowed me to travel this path.

I'll be in touch shortly.

Thank you.

Deepak

On May 13, 2009, at 9:07 PM, Kohlenberg wrote:

Deepak, thanks a lot for the quick response.  
Talk to you soon, Kerstin

Am 13.05.2009 14:01 Uhr schrieb "Deepak Moorjani" unter [deepakmoorjani@gmail.com](mailto:deepakmoorjani@gmail.com):

Hi. Thank you for the note. We are preparing for a hearing on Friday.  
I will be on touch soon. Deepak

Sent from my handheld device.

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Zeitverlag Gerd Bucerius GmbH & Co. KG, 20079 Hamburg  
Aufsichtsratsvorsitzender: Dr. Stefan von Holtzbrinck  
Geschäftsführer: Dr. Rainer Esser  
Handelsregister Hamburg HRA 91123  
Amtsgericht Hamburg  
<http://www.zeit.de/>

*a memo from the desk of*  
**Deepak Moorjani**

*Sunday, December 12, 2021*

Seema Moorjani  
Sunil Moorjani

*via certified mail*

to: Seema Moorjani  
Sunil Moorjani  
(collectively, the “Defendants”)

subject: Moorjani v. Moorjani et al.  
San Diego Superior Court Case No.: 37-2021-00033119-CU-OR-CTL  
Responsive Pleading: Extension of Response Deadline to January 31, 2022

*Mom: “She [Seema] does not like this side of the family.”*

**1. Grant of Extension:** On September 26, 2021, I delivered an Offer to Mediate to Seema Moorjani, and the Defendants rejected my offer to mediate. Consequently, I filed a First Amended Complaint on November 22, 2021 in San Diego Superior Court (Case No. 37-2021-00033119-CU-OR-CTL). The First Amended Complaint is item #14 in the Register of Actions.

The First Amended Complaint was served to the Defendants directly via USPS certified mail. USPS tracking information (#70163010000034555499) shows: (i) on November 22, 2021 at 8:48am, the package was “Held at Post Office, At Customer Request,” (ii) on November 26, 2021 at 12:11pm, the package was not delivered but “Notice Left (No Authorized Recipient Available)”, and (iii) on November 27, 2021, the package was not delivered but “The customer has requested that the Postal Service redeliver this item on November 29, 2021 in SAN DIEGO, CA 92131.”

With the holiday season, I am granting the Defendants an extension of time. The Defendants should file a responsive pleading by Monday, January 31, 2021. The Defendants may also wish to seek new legal counsel for the trial.

**2. Adult Protective Services:** I would like the Defendants to submit a copy of their responsive pleading to Adult Protective Services in San Diego County, California and Lucas County, Ohio. On May 25, 2021, I initially contacted Adult Protection Services (“APS”) in San Diego County, California to request an investigation on the elder abuse of Ms. Zubeida Moorjani. On November 19, 2021, I recontacted APS in San Diego, and I delivered a copy of the First Amended Complaint (Note: This is disclosed in the Motion to Disqualify John Alessio et al.).

On December 08, 2021, I notified APS in San Diego of the Motion to Disqualify John Alessio et al.

**3. Motion to Disqualify John Alessio et al.:** On December 07, 2021, I filed a Notice of Motion and Motion to Disqualify Attorney John Alessio and the Law Firm of Procopio, Cory, Hargreaves & Savitch LLP, a Memorandum of Points and Authority, and a Declaration of Plaintiff in Support of Motion to Disqualify (“Motion to Disqualify John Alessio et al.”). The Motion to Disqualify John Alessio et al. is item #16 in the Register of Actions, and the Motion Hearing Date is May 13, 2022.

The Motion to Disqualify John Alessio et al. has been served on John Alessio (Bar No. 174900) of Procopio, Cory, Hargreaves & Savitch, LLP ("Procopio") via USPS Certified Mail. USPS tracking information (#70120470000162659589) shows "Your item was delivered to an individual at the address at 8:26 am on December 11, 2021 in SAN DIEGO, CA 92101."

Currently, John Alessio is serving his second three-year term as the managing partner of Procopio, an AmLaw 200 firm with 180+ lawyers in Del Mar Heights, Las Vegas, Orange County, Palo Alto, San Diego and Scottsdale. According to his public biography, John Alessio is a member of the California bar who "focuses on complex class action, business and employment litigation with particular experience in trade secret misappropriation, unfair competition, real estate, shareholder and contractual disputes to include cross-border issues."

John Alessio and Sunil Moorjani are former classmates at the University of San Diego Law School ('94), and John Alessio may have allowed a personal relationship to compromise his legal judgment. As a member of the California bar, John Alessio should have recognized the conflict of interest, and he should have declined to represent the Defendants. Given his public claims of competence and sophistication, it is implausible to assume that John Alessio did not recognize the conflict of interest, and it is plausible to assume that John Alessio has acted intentionally.

In the Motion to Disqualify John Alessio et al., John Alessio's emails have been produced, and John Alessio's emails show that Procopio have consistently sought to suppress the Elder Abuse litigation in order to obtain a dismissal with prejudice. However, John Alessio et al. have repeatedly affirmed that they have client relationships with Gulab Moorjani, Seema Moorjani, Sunil Moorjani and Zubeida Moorjani.

Despite the filing of the First Amended Complaint for Elder Abuse, John Alessio et al. failed to recuse themselves. In his November 30, 2021 email (attached), one of John Alessio's junior associates acknowledged that the First Amended Complaint for Elder Abuse was filed; however, the junior associate (Zagros Bassirian, Bar No. 299581) actively solicited a settlement proposal.

In my recent APS notification, I delivered a copy of John Alessio's November 30, 2021 email.

The First Amended Complaint for Elder Abuse was served on John Alessio (USPS tracking #70170190000048246584). Despite this service of process, John Alessio et al. failed to recuse themselves. In his December 07, 2021 email (attached), one of John Alessio's junior associates acknowledged that the First Amended Complaint for Elder Abuse was served on John Alessio.

In his conversations with APS in San Diego and Lucas County, John Alessio should disclose this December 07, 2021 email. Also, John Alessio should disclose whether his attempts to suppress the Elder Abuse litigation has included contacting attorneys in other jurisdictions (e.g. Eastman & Smith; Heban, Murphree & Lewandowski) in order to obtain confidential information about Ms. Zubeida Moorjani. (Note: Breda Osburn may be reached at 419.213.8814 and [breda.osburn@jfs.ohio.gov](mailto:breda.osburn@jfs.ohio.gov)).

Thank you for your kind attention. I hope you have a wonderful holiday season.

cc: Breda Osburn  
cc: Brigid Heid  
cc: John Alessio  
cc: Kevin Heban  
cc: Lynn Balshone Jacobs  
cc: Soueja Kummar

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Oriet Cohen-Supple <Oriet@wrightandsupple.com>  
Resent-From: Oriet Cohen-Supple <Oriet@wrightandsupple.com>  
To: Deepak Moorjani <Deepak.Moorjani@procopio.com>  
Fwd: Moorjani: Confirmation of Extension (October 18, 2021)

November 30, 2021 1:15 PM

Hi Deepak,

Re: Moorjani: Confirmation of Extension (October 18, 2021) <Deepak.Moorjani@procopio.com>

Oriet Cohen-Supple, Partner  
Cell: 1-510-495-5749

Begin forwarded message:

**From:** "Bassirian, Zagros S." <zag.bassirian@procopio.com>  
**Date:** November 30, 2021 at 1:03:34 PM PST  
**To:** Oriet Cohen-Supple <Oriet@wrightandsupple.com>  
**Cc:** "Turpin, Melissa Avitia" <Melissa.Turpin@procopio.com>, "Alessio, John D." <john.alessio@procopio.com>, Mary Wright <mary@wrightandsupple.com>  
**Subject:** RE: Moorjani: Confirmation of Extension (October 18, 2021)

Oriet –

Hope all is well. We did not receive the proposal you mentioned in October, and while I see the FAC was filed on 11/22, we were not served with a copy. Please let us know the status of this case and whether you intend to serve the FAC. Thank you.

Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | [zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)  
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101  
[View Profile](#) | [LinkedIn](#) | [procopio.com](http://procopio.com)

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**From:** Oriet Cohen-Supple <Oriet@wrightandsupple.com>  
**Sent:** Thursday, October 21, 2021 9:14 AM  
**To:** Bassirian, Zagros S. <zag.bassirian@procopio.com>  
**Cc:** Turpin, Melissa Avitia <Melissa.Turpin@procopio.com>; Alessio, John D. <john.alessio@procopio.com>; Mary Wright <mary@wrightandsupple.com>  
**Subject:** Re: Moorjani: Confirmation of Extension (October 18, 2021)

**\* EXTERNAL EMAIL - Please use Caution. \***

As to a proposal, I will reach out next week via email. Stay tuned.

Oriet Cohen-Supple, Partner  
Cell: 1-510-495-5749

On Oct 21, 2021, at 9:12 AM, Bassirian, Zagros S. <[zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)> wrote:

Good Morning, Oriet –

Understood. Please confirm our clients need not respond to the complaint and your client will not seek a default in the interim.

On resolution, I believe you were going to make a proposal. Please do that under separate cover.

Oriet Cohen-Supple <[oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)>  
Re: RE: Moorjani: Confirmation of Extension (October 18, 2021)  
To: Deepak Moorjani <[deepak@moorjani.com](mailto:deepak@moorjani.com)>  
FW: Moorjani: Confirmation of Extension (October 18, 2021)

December 7, 2021 3:16 PM

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**From:** Oriet Cohen-Supple <[oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)>  
**Sent:** Tuesday, December 7, 2021 3:16 PM  
**To:** Bassirian, Zagros S. <[zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)>  
**Cc:** Turpin, Melissa Avitia <[Melissa.Turpin@procopio.com](mailto:Melissa.Turpin@procopio.com)>; Alessio, John D. <[john.alessio@procopio.com](mailto:john.alessio@procopio.com)>; Mary Wright <[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com)>  
**Subject:** RE: Moorjani: Confirmation of Extension (October 18, 2021)

The client is in the process of transitioning to a new counsel. Either the client or the new counsel will contact you soon.

**From:** Bassirian, Zagros S. <[zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)>  
**Sent:** Tuesday, December 7, 2021 3:12 PM  
**To:** Oriet Cohen-Supple <[oriet@wrightandsupple.com](mailto:oriet@wrightandsupple.com)>  
**Cc:** Turpin, Melissa Avitia <[Melissa.Turpin@procopio.com](mailto:Melissa.Turpin@procopio.com)>; Alessio, John D. <[john.alessio@procopio.com](mailto:john.alessio@procopio.com)>; Mary Wright <[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com)>  
**Subject:** RE: Moorjani: Confirmation of Extension (October 18, 2021)

Oriet –

I received a copy of the amended complaint in the mail and it was filed in pro per. Are you no longer representing Deepak?

Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

P. 619.906.5759 | F. 619.744.5478 | [zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)  
525 B STREET, SUITE 2200, SAN DIEGO, CA 92101  
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**Cc:** Turpin, Melissa Avitia <[Melissa.Turpin@procopio.com](mailto:Melissa.Turpin@procopio.com)>; Alessio, John D. <[john.alessio@procopio.com](mailto:john.alessio@procopio.com)>; Mary Wright <[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com)>  
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Best,

**ZAG S. BASSIRIAN**  
ASSOCIATE  
PROCOPIO

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**To:** Bassirian, Zagros S. <[zag.bassirian@procopio.com](mailto:zag.bassirian@procopio.com)>  
**Cc:** Turpin, Melissa Avitia <[Melissa.Turpin@procopio.com](mailto:Melissa.Turpin@procopio.com)>; Alessio, John D. <[john.alessio@procopio.com](mailto:john.alessio@procopio.com)>; Mary Wright <[mary@wrightandsupple.com](mailto:mary@wrightandsupple.com)>  
**Subject:** Re: Moorjani: Confirmation of Extension (October 18, 2021)